

DAVID JONATHAN TULIS,)
)
 Plaintiff,) **Case No. 3:22-00911**
 v.)
)
 WILLIAM ORANGE, et al.)
)
 Defendants.)

Comes Defendant City of Franklin, Tennessee, and moves for dismissal pursuant to Federal Rule of Civil Procedure 12(b)(6). As grounds for dismissal, Defendant asserts that this cause of action is barred by the statute of limitations, Plaintiff's complaint fails to state a claim upon which relief can be granted, and the City retains immunity from any potentially asserted state law claims pursuant to the Tennessee Governmental Tort Liability Act. For the reasons set forth above, and more fully explained in the accompanying *Memorandum of Law*, Defendant respectfully requests that its motion be granted.

/s/ Shauna Billingsley
Shauna R. Billingsley, BPR No. 023362
City Attorney
City of Franklin, Tennessee Law Department
109 3rd Avenue South
Franklin, TN 37064
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this the 3rd day of January, 2023, a copy of the Motion to Dismiss was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt as follows:

Shauna R. Billingsley, Esq.
109 Third Avenue South
Franklin, Tennessee 37064

Attorney for City of Franklin, Tennessee

A copy has also been delivered to the pro se plaintiff as follows:

☒ By placing postage prepaid envelope in United States Mail Service, addressed to:

David Jonathan Tulis
10520 Brickhill Lane
Soddy-Daisy, TN 37379
Davidtuliseditor@gmail.com

This the 3rd day of January, 2023.

/s/Gina S. Vogel

Gina S. Vogel, Esq. (BPR #033526)